

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Western District of TexasUnited States of America  
v.  
MELVIN LEE SULLIVAN DEAMS

Case No. SA15-838M

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 8, 2015 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section*  
18 U.S.C. 1591*Offense Description*  
Sex Trafficking of a Minor.

PENALTIES: Max 10 years imprisonment, Max \$250,000 fine, 5 years supervised release, \$100 mandatory special assessment.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.


Complainant's signature

Carla Clark, FBI S/A  
Printed name and title

Sworn to before me and signed in my presence.

Date: 10/09/2015

Judge's signature

City and state: San Antonio, TexasPAMELA A. MATHY, US MAGISTRATE JUDGE  
Printed name and titleFiled  
10-9-15  
Clerk, U. S. District Court  
Western District of Texas  
By  Deputy

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Carla S. Clark, the Affiant herein, first being duly sworn, do state as follows:

1. Your Affiant is employed as a Special Agent with the Federal Bureau of Investigation (FBI) in San Antonio, Texas. Your Affiant has been a Special Agent with the FBI since August 2005.

Your Affiant's experiences as a Special Agent include, but are not limited to, conducting investigations, executing arrest warrants, executing search warrants, collection of evidence, interviewing of subjects and witnesses, use of force, firearms and other law enforcement related topics. Your Affiant is currently assigned to the FBI Violent Crimes Unit, where she conducts investigations relating to violations of the laws of the United States as they relate to crimes against children.

2. The factual information supplied in this affidavit is based upon your Affiant's own investigation as well as information provided by other law enforcement officers. Since this affidavit is submitted for the purpose of securing arrest warrants, it does not include every fact known to me concerning this investigation. I have set forth the facts that establish probable cause to believe that **MELVIN LEE SULLIVAN DEAMS** (a.k.a. Melvin Jr. and Sunny) Engaged in Sex Trafficking of a Minor in violation of Title 18, United States Code, Section 1591.

3. On October 9, 2015, as part of an undercover operation, Special Agent Carla Clark, FBI, interviewed Child Victim 1 (CV1), age 15, who voluntarily provided the following information. CV1 posted herself in an advertisement on the social networking website known as Backpage.com as an escort named "Red". To access backpage.com, it is necessary to use either the internet connection or a telephone capable of accessing the internet. An adult male Confidential Human Source (CHS), acting in an undercover capacity, telephonically responded to the advertisement and spoke to Child Victim 2 (CV2), age 15. A date was arranged and CV1

and CV2 were to travel to the CHS's hotel room for the date. The date was to take place on October 8, 2015. The CHS was to pay \$350 to CV2 in exchange for sex acts involving the CHS, CV1, and CV2.

4. On the evening of October 8, 2015, shortly thereafter, CV1 and CV2 arrived at the CHS's hotel, Holiday Inn Express, 102 Spencer Lane, San Antonio, Texas, Western District of Texas. CV1 and CV2 were driven to the hotel by DEAMS.

5. Law enforcement officers recovered CV1 and CV2. Child Victim 3 and Child Victim 4 were recovered from a house in San Antonio, Texas. DEAMS was arrested.

6. CV1 was interviewed by SA Clark and other law enforcement officers. CV1 stated DEAMS takes one half of the money CV1 makes for CV1's prostitution acts. DEAMS father, Melvin Sullivan Sr., a.k.a. Wink, takes the other half of CV1's money from these acts. DEAMS physically abuses CV1 by hitting and slapping CV1 if CV1 does not make enough money from prostitution acts.

7. SA Clark and other law enforcement officers interviewed CV3, age 16. CV3 stated DEAMS takes money from CV1 that CV1 earned by exchanging US Currency for sexual activities. CV3 also stated that DEAMS physically abuses CV1 and does not feed her.

8. Based on the aforementioned facts, your affiant respectfully submits that there is probable cause to believe that DEAMS benefited financially from the commercial sex acts of CV1 and transported CV1 for the purposes of commercial sex trafficking in violation of Title 18, United States Code, Section 1591.



Carla S. Clark, Special Agent  
U.S. Federal Bureau of Investigation

Sworn to and subscribed before me this 9 day of October, 2015.



PAMELA A. MATHEY  
U.S. MAGISTRATE JUDGE